

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Marco Antonio Llanos-Meija,)	
)	
Plaintiff,)	
)	No. 11-cv-07310
v.)	
)	
Berns Auto Sales, Inc., et. al.)	
)	JURY DEMANDED
Defendants.)	

MOTION FOR PROVE-UP AND TO ENTER JUDGMENT

NOW COMES Plaintiff, by and through his attorneys, ROBERT J. SEMRAD & ASSOCIATES, L.L.C., and in moving this Honorable Court to enter judgment against Defendants, Dana Brown and ADDB Towing & Recovery Service, LLC, states as follows:

1. Plaintiff filed a Complaint at Law alleging various state and federal statutory violations against three defendants, stemming from a repossession incident.
2. This Honorable Court granted Plaintiff's motion for default against two of the three Defendants, Dana Brown and ADDB Towing & Recovery Service, LLC, on January 30, 2013.
3. To date, Defendants, Dana Brown and ADDB Towing & Recovery Service, LLC, have not appeared.
4. Plaintiff seeks to have a judgment entered against Defendants, Dana Brown and ADDB Towing & Recovery Service, LLC, jointly and severally, in the amount of \$30,344.02.
5. Support for this amount is attached.

WHEREFORE Plaintiff respectfully request this Honorable Court enter judgment against Defendants, Dana Brown and ADDB Towing & Recovery Service, LLC, jointly and severally, in the amount of \$30,344.02

Respectfully submitted,

/s/ Christian D. Elenbaas
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